

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CIVIL ACTION NO. 1:23-CV-270

MACKENZIE ELAINE BROWN

Plaintiffs,

v.

HENDERSON COUNTY
SHERIFF'S OFFICE, et al.

Defendants.

**MOTION FOR EXTENSION
OF TIME**

NOW COMES Defendants Henderson County Sheriff's Office, Robert Jordan Warren, Michael Scott Lindsay, Crystal D. Landers, Johnny E. Duncan, Jr., Bradley R. Reese, and Brittany Nicole Maybin (the "Moving Defendants"), pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Local Rule 7.1, and files this Motion for an extension of time to respond to Plaintiff's Complaint. In support of this motion, the Moving Defendants state as follows:

1. Plaintiff filed her complaint in the instant action on September 18, 2023.
2. The Complaint was served upon the Moving Defendants via the U.S. Marshal's Service, on October 11, 2023.
3. The Moving Defendants' time to answer or otherwise respond to Plaintiff's Complaint- November 1, 2023- has not yet expired.

4. The Moving Defendants need additional time to investigate the allegations contained in the Complaint.

5. This Motion is made in good faith and not for delay or an improper purpose.

WHEREFORE, the Moving Defendants hereby request a twenty day extension of time to respond to the Plaintiff's Complaint through and including Tuesday, November 21, 2023.

This 30th day of October, 2023.

s/Sean F. Perrin

Womble Bond Dickinson (US) LLP

301 S. College Street, Ste. 3500

Charlotte, North Carolina 28202

Telephone: 704-331-4992

Facsimile: 704-338-7814

Sean.Perrin@wbd-us.com

*Attorney for Defendants Henderson County
Sheriff's Office, Robert Jordan Warren,
Michael Scott Lindsay, Crystal D. Landers,
Johnny E. Duncan, Jr., Bradley R. Reese, and
Brittany Nicole Maybin*

CERTIFICATE OF SERVICE

I certify that I filed the foregoing via the CM/ ECF system and mailed the foregoing to the following non CM/ ECF user as follows:

Mackenzie Elaine Brown
158 Haven Road
East Flat Rock, NC 28726

Dated: October 30, 2023.

s/Sean F. Perrin